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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

TED TIMMONS,

Plaintiff,

v.

CITY OF PORTLAND, and BRYCE  
ASKELSON,

Defendants.

Case No. 3:22-cv-1235-SB

DECLARATION OF JUAN C. CHAVEZ

I, Maya Rinta, do hereby declare:

1. I am one of the attorneys representing Plaintiff Ted Timmons in this matter.
2. I make this declaration in support of Plaintiff's Unopposed Motion to Extend the Case Deadlines in the above-named case.
3. I have conferred with Counsel for the Defendants, Caroline Turco, and the Defendants do not object to this motion.
4. There is good cause to grant Plaintiff's motion.
5. Defendants' Motion was filed prior to the long Thanksgiving holiday.

6. Additionally, I am preparing for a trial before Judge Hernández set to begin December 1, 2022 in the matter *Senn v. Smith*, USDC Case No. 3:18-cv-01814-HZ.
7. I believe I will be able to complete a responsive brief by next Wednesday, December 7, 2022.
8. I make this motion in good faith and without the intent to unduly delay this matter.

**DATED** November 30, 2022

/s/ Juan C. Chavez  
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